

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action

Lead Case No.:

3:21-CV-00259-DCG-JES-JVB

CECILIA GONZALES, et al.,

Plaintiffs,

v.

JANE NELSON, et al.,

Defendants.

Consolidated Case No.:

1:21-CV-00965-DCG-JES-JVB

GONZALES PLAINTIFFS' RULE 26(a)(3) PRETRIAL DISCLOSURES

Plaintiffs Cecilia Gonzales, Agustin Loreda, Jana Lynne Sanchez, Jerry Shafer, and Debbie Lynn Solis, (the "Gonzales Plaintiffs"), by and through their undersigned counsel, hereby submit the following Pretrial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Pretrial Scheduling Order (Dkt. 880). The Gonzales Plaintiffs reserve the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants' Pretrial Disclosures, as appropriate.

I. WITNESSES¹

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), the Gonzales Plaintiffs expect to present the following witnesses at trial:

1. Stephen Ansolabehere, PhD, Frank G. Thompson Professor of Government at Harvard University
2. Allan Lichtman, PhD, Distinguished Professor of History, American University

The Gonzales Plaintiffs may call the following witnesses at trial:

1. Cecilia Gonzales
2. Agustin Loreda
3. Jana Lynne Sanchez
4. Jerry Shafer
5. Debbie Lynn Solis

Because these cases are consolidated for trial, the Gonzales Plaintiffs reserve the right to also rely on the testimony of witnesses called by other plaintiffs in these consolidated cases.

The Gonzales Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial. Accordingly, the Gonzales Plaintiffs reserve the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call their witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on Defendants' witness list and any witness necessary to rebut Defendants' case, arguments, and/or evidence, and/or to authenticate or lay the foundation for the introduction of documents to which Defendant objects; (4) reasonably supplement or amend this Witness List through and including the time of trial to the extent permitted by the Court; (5) introduce deposition testimony

¹ All witnesses may be contacted through counsel for the Gonzales Plaintiffs.

as impeachment evidence; or (6) change a witness from a live witness to a witness testifying by deposition, and vice versa. The Gonzales Plaintiffs also reserve the right to supplement or modify this witness list in response to rulings made by the Court. The Gonzales Plaintiffs' identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants.²

II. TRIAL EXHIBITS

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(iii), the Gonzales Plaintiffs' Preliminary Trial Exhibit List is set forth below. These documents are listed in addition to the documents listed on the parties' joint exhibit list. The Gonzales Plaintiffs reserve the right to supplement this exhibit list with any proposed joint exhibits to which Defendants object. The Gonzales Plaintiffs further reserve the right to introduce in evidence any documents identified by Defendants or any other consolidated plaintiff group in their Pre-Trial Disclosures, to introduce additional documents as rebuttal or impeachment evidence, and to rely on the full trial record in support of their claims.

The Gonzales Plaintiffs' list of trial exhibits does not include demonstrative exhibits, which will be identified and exchanged at a mutually agreeable time prior to trial. The Gonzales Plaintiffs will serve their objections to Defendants' trial exhibit list and any additional trial exhibits in accordance with the Court's Pretrial Scheduling Order.

The Gonzales Plaintiffs expect to offer the following exhibits at trial:

Exhibit Number	Description
Gonzales Plaintiffs' Exhibit 1	Declaration of Cecilia Gonzales*
Gonzales Plaintiffs' Exhibit 2	Declaration of Agustin Loreda*

² Pursuant to the parties' agreement and the Court's May 2, 2025 Text Order, the parties will exchange deposition designations as required under Federal Rule of Civil Procedure 26(a)(3) for any witnesses testifying by deposition on May 7, 2025.

Gonzales Plaintiffs' Exhibit 3	Declaration of Jana Lynne Sanchez*
Gonzales Plaintiffs' Exhibit 4	Declaration of Jerry Shafer*
Gonzales Plaintiffs' Exhibit 5	Declaration of Debbie Lynn Solis*
Gonzales Plaintiffs' Exhibit 6	Expert Report of Dr. Stephen Ansolabehere, May 20, 2022
Gonzales Plaintiffs' Exhibit 7	Supplemental Expert Report of Dr. Stephen Ansolabehere, June 13, 2022
Gonzales Plaintiffs' Exhibit 8	Rebuttal Report of Dr. Stephen Ansolabehere, July 27, 2022
Gonzales Plaintiffs' Exhibit 9	Second Supplemental Report of Dr. Stephen Ansolabehere, March 31, 2025
Gonzales Plaintiffs' Exhibit 10	Addendum to the Second Supplemental Report of Dr. Stephen Ansolabehere, April 28, 2025
Gonzales Plaintiffs' Exhibit 11	Expert Report of Dr. Allan Lichtman, May 20, 2022
Gonzales Plaintiffs' Exhibit 12	Rebuttal Report of Dr. Allan Lichtman, July 27, 2022

*Exhibit to be filed under seal. A redacted version will be filed on the public docket.

The Gonzales Plaintiffs may offer the following exhibits at trial:

Exhibit Number	Description
Gonzales Plaintiffs' Exhibit 13	Gonzales Plaintiffs' Demonstration Map 2 – Exhibit 2 to the May 20, 2022 Expert Report of Dr. Stephen Ansolabehere
Gonzales Plaintiffs' Exhibit 14	Plan C2198, Gonzales Plaintiffs' Demonstration Map 2, DistrictViewer, available at https://dvr.capitol.texas.gov/Congress/71/PLANC2198

The following exhibits have been proposed by the Gonzales Plaintiffs as joint exhibits. Because the parties have not yet reached final agreement on joint exhibits, the Gonzales Plaintiffs disclose them here to preserve their rights should the parties be unable to reach agreement. Accordingly, the Gonzales Plaintiffs may offer the following exhibits at trial:

Exhibit Number	Description
Gonzales Plaintiffs' Exhibit 15	Map of Plan C2198 (Gonzales Plaintiffs' Demonstration Map 2), from Texas Legislative Counsel's District Viewer

Gonzales Plaintiffs' Exhibit 16	Map Report Package for Plan C2198 from Texas Legislative Counsel's District Viewer
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Dated: May 2, 2025

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 2, 2025, and that all counsel of record were served by CM/ECF.

/s/ David R. Fox